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Attorneys for Defendant  
TRANSAMERICA LIFE  
INSURANCE COMPANY

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JASON BOUTROS,

Plaintiff,

v.

TRANSAMERICA LIFE INSURANCE  
COMPANY,

Defendant.

Case No. 2:22-cv-5724

**DEFENDANT TRANSAMERICA  
LIFE INSURANCE COMPANY'S  
NOTICE OF REMOVAL**

Complaint Filed: July 13, 2022

1           1. Defendant Transamerica Life Insurance Company (“TLIC”) hereby  
2 removes the above-captioned action (“Action”) to this Court from the Superior  
3 Court of the State of California, County of Los Angeles. As set forth below, TLIC  
4 has complied with the statutory requirements for removal under 28 U.S.C. §§ 1441  
5 and 1446, and this Court has diversity jurisdiction over this action pursuant to 28  
6 U.S.C. § 1332(a).

7                           **I. COMMENCEMENT AND SERVICE**

8           2. On July 13, 2022, Jason Boutros (“Plaintiff”) commenced this action  
9 against TLIC by filing a lawsuit in the Superior Court of the State of California,  
10 County of Los Angeles, styled *Jason Boutros, an individual, Plaintiff vs.*  
11 *Transamerica Life Insurance Company, an Iowa Corporation, Defendant*, Case No.  
12 22STCV22570 (the “Complaint” or “Compl.”).

13           3. Plaintiff personally served TLIC with the Complaint on July 14, 2022.

14                           **II. GROUNDS FOR REMOVAL**

15           4. Pursuant to 28 U.S.C. § 1446(b)(1), this Notice of Removal is timely  
16 filed within thirty days of TLIC being personally served with the Complaint, which  
17 occurred on July 14, 2022. This Notice of Removal is also filed within one year of  
18 the commencement of this action, and is thus timely pursuant to 28 U.S.C. §  
19 1446(c).

20           5. Further, this Court has subject matter jurisdiction under 28 U.S.C. §  
21 1332, which confers original jurisdiction of “all civil actions where the matter in  
22 controversy exceeds the sum or value of \$75,000, exclusive of interest and costs,  
23 and is between ... citizens of different States and in which citizens or subjects of a  
24 foreign state are additional parties[.]”

25           6. In the Complaint, Plaintiff alleges that he is a citizen and resident of  
26 Los Angeles County in the State of California. (Compl. ¶ 1).

27           7. In addition, Plaintiff alleges that TLIC “is an insurance company  
28 domiciled in the State of Iowa.” (*Id.* ¶ 2). TLIC, a corporation, is a life insurance

1 company incorporated under the laws of Iowa with its home office and corporate  
2 headquarters in Iowa, from which management directs, controls and coordinates  
3 most of the company's activities. Therefore, TLIC is a citizen of Iowa for diversity  
4 jurisdiction purposes.

5 8. Accordingly, the citizenship of parties are diverse in this action.

6 9. Plaintiff also seeks monetary relief in excess of \$75,000. In particular,  
7 Plaintiff alleges that he has suffered economic losses and damages by losing his  
8 "investment" (the life insurance policy at issue in the Complaint) which he avers is  
9 "worth more than \$2,000,000." (*Id.* at "Summary of Action," ¶¶ 34, 46).  
10 Accordingly, since the total amount in controversy in this action exceeds the sum of  
11 \$75,000.00, this Court has jurisdiction under 28 U.S.C. § 1332.

### 12 III. VENUE

13 10. The Complaint was filed in the Superior Court of California for the  
14 County of Los Angeles. Removal of the state court action to this Court is proper  
15 under 28 U.S.C. 1441(a) because this Court's district and division embraces the state  
16 courts in the County of Los Angeles. *See* 28 U.S.C. § 1441(a) (civil actions brought  
17 in state court to be removed to the district court "embracing the place where such  
18 action is pending"); 28 U.S.C. § 84(c)(2) (listing the counties within the Western  
19 Division of the Central District of California).

### 20 IV. CONSENT TO REMOVAL

21 11. No consent to removal is necessary as TLIC is the only named  
22 defendant in this lawsuit.

### 23 V. EXHIBITS TO NOTICE OF REMOVAL

24 12. True and correct copies of all pleadings and documents previously  
25 filed are attached to this Notice of Removal as correspondingly numbered exhibits:

26 Exhibit	Description
27 A.	Complaint

B.	First Amended General Order
C.	Voluntary Efficient Litigation Stipulation Packet
D.	Summons for the Complaint
E.	Civil Case Cover Sheet
F.	Notice of Case Assignment
G.	Alternative Dispute Resolution Packet
H.	Proof of Service of Summons
I.	Notice of Case Management

13. Pursuant to 28 U.S.C. § 1446(d), a complete copy with Exhibit 1 thereto of the Notice to State Court and Adverse Parties of Removal of this Action to Federal Court, a copy of which is attached hereto as Exhibit J (less Exhibit 1), together with this Notice of Removal, will be served upon counsel for Plaintiff and will be filed with the clerk of the Superior Court for the County of Los Angeles.

## VI. CONCLUSIONS

WHEREFORE, TLIC, pursuant to the statutes cited herein and in conformity with the requirements set forth in 28 U.S.C. 1446, removes this action from the Superior Court of the State of California, County of Los Angeles, to this Court.

Dated: August 12, 2022

MAYNARD COOPER & GALE LLP

By: */s/ Vivian I. Orlando*  
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Attorneys for Defendant  
Transamerica Life Insurance  
Company